

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

LIFENET HEALTH,

Plaintiff,

v.

TISSUE REGENIX GROUP PLC, TISSUE
REGENIX WOUND CARE, INC., and
COMMUNITY TISSUE SERVICES,

Defendants.

Civil Action No. 1:17-cv-00533

JURY TRIAL DEMANDED

Hon. Liam O'Grady

**CONSENT MOTION FOR EXTENSION OF TIME
TO RESPOND TO AMENDED COMPLAINT**

Tissue Regenix Group PLC, Tissue Regenix Wound Care Inc., and Community Tissue Services (collectively, "Defendants"), by counsel, move this Court for an extension of time to October 3, 2017 to respond to the Amended Complaint filed by the Plaintiff LifeNet Health ("LifeNet Health"), and in support thereof state as follows:

1. On June 29, 2017, LifeNet Health filed the Amended Complaint. Thereafter, on July 17, 2017, LifeNet Health served the Amended Complaint on Tissue Regenix Wound Care Inc., and on July 18, 2017 LifeNet Health served the Amended Complaint on Community Tissue Services. Currently, responses to the Amended Complaint are due for Tissue Regenix Wound Care Inc. on August 7, 2017, and for Community Tissue Services on August 8, 2017.

2. Because Tissue Regenix Group PLC is a British entity, LifeNet Health instituted service of process under the Hague Convention. In an effort to simplify service, Tissue Regenix Group PLC has agreed to waive and accept service of the Amended Complaint pursuant to Rule 4 of the Federal Rules of Civil Procedure in this matter in exchange for a consolidated, extended date for all defendants. LifeNet Health has agreed to Defendants' request and consents to this

motion for an extension of time to respond to the Amended Complaint.

3. Under Rule 4, Tissue Regenix Group PLC would be allowed at least 60 days to respond from waiver of service. The requested extension is requested in good faith to allow the Defendants to investigate this matter and provide a coordinated response. Allowing the Defendants through October 3, 2017 to file their responses to the Amended Complaint will not prejudice any party. This matter has just begun and there are no pretrial dates set at this time. Also, the additional time will allow the parties to meet and confer to streamline this matter and to explore possible avenues of resolution.

4. A proposed order granting the defendants leave to file their responses to the Amended Complaint on or before October 3, 2017 is attached as **Exhibit 1**.

WHEREFORE, defendants Tissue Regenix Group PLC, Tissue Regenix Wound Care Inc., and Community Tissue Services, by counsel, request that this Court grant their request for an extension of time to file their responses to the Amended Complaint through and including October 3, 2017, as set forth in the proposed agreed order attached as **Exhibit 1**.

Dated: August 7, 2017

Respectfully submitted,

/s/ Stephen J. Gombita

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CONSENTED TO:

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August, 2017, I filed copies of the attached pleadings with ECF Filing System that will electronically send copies to all counsel of record including:

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